

Eric Schlaf
Illinois Commerce Commission
527 E. Capitol Ave
Springfield, IL 62701

Eric,

The Operating Engineers State Council appreciated the opportunity to attend the workshop on April 26, 2017 to review the Commission's draft rules on utility-scale installer certification.

We appreciate that the definition of "install" is drafted to be limited "to the electrical wiring and connections necessary to interconnect the new solar or new wind project with the electric utility's distribution system at the point of interconnection between the project and the utility."

Our reason for attending the workshop was concern about the interpretation of the rule, specifically the definition of install, and the workshop helped ease those concerns. We do ask that the Commission consider revising the 3rd paragraph following the definition of "install" to include the term "construction" as suggested below. We also believe inserting the word "directly" before associated in same paragraph helps to demonstrate the narrow scope of the definition.

I believe tasks preformed by individuals such as the contractor or supervisor is intended to include construction activities not associated with "the electrical wiring and connections necessary to interconnect the new solar or new wind project with the electric utility's distribution system at the point of interconnection between the project and the utility." However, it is our opinion that specifically referencing "construction" will make the exemptions to the definition of "install" clearer.

Suggested language:

"Install" means to perform the electrical wiring and connections necessary to interconnect the new solar or new wind project with the electric utility's distribution system at the point of interconnection between the project and the utility. The meaning of "install" in this Part specifically does not include:

Electrical wiring and connections to interconnect the new solar or new wind project performed by utility workers on the electric utility's distribution system;

Electrical wiring and connections internal to the new solar or new wind project performed by the manufacturer; or

Tasks not directly associated with the electrical interconnection of the new solar or new wind project and the utility, including those relating to construction, planning, and project management performed by individuals such as an inspector, management planner, consultant, project designer, contractor or supervisor for the project.

Thank you for your consideration,

Steve Zahn
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